

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**SHARON DORSEY,** )  
                        )  
                        )  
**PLAINTIFF,**       )  
                        )  
                        )  
**v.**                   )       **2:22-cv-01489-ACA**  
                        )  
                        )  
**TRANS UNION, LLC, and I.C.**   )  
**SYSTEM, INC.**       )  
                        )  
**DEFENDANTS.**      )

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**MOTION FOR LEAVE TO FILE AMENDED COMPLAINT**

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**COMES NOW** the Plaintiff, **SHARON DORSEY**, by and through her undersigned counsel, and moves this Court for an Order allowing her to file an Amended Complaint. As grounds, Plaintiff states as follows:

1.     The complaint in this matter was originally filed on October 18, 2022, in the Circuit Court of Blount County, Alabama. The complaint alleged violations of the Fair Credit Reporting Act against both defendants and violations of the Fair Debt Collection Practices Act against IC System, Inc.
2.     This matter was removed to this Court by Defendants on November 23, 2022. [Doc. 1].

3. This Court entered a Scheduling Order [Doc. 14] on January 13, 2023.
4. The Scheduling Order states: “No causes of action, defenses, or parties may be added after **April 3, 2023**, as to plaintiff and **April 17, 2023**, as to defendants.”
5. Plaintiff filed discovery requests with her state court complaint. However, she did not receive responses to her request for production directed toward IC System, Inc. until April 6, 2023, after the deadline to add causes of action, defenses or parties.
6. Part of IC System, Inc.’s production included two recordings of telephone calls between the Plaintiff and agents or employees of IC System. The dates of the calls were March 3, 2021, and November 1, 2021.
7. Plaintiff requests leave to amend her complaint to add facts relating to these two calls as well as adding an additional Fair Debt Collection Practices Act code section that she contends IC System violated. Plaintiff’s original complaint alleged that IC System violated the FDCPA, as such, **Plaintiff does not seek to add any additional parties or causes of action in her amended complaint.**
8. A copy of the proposed amended complaint is attached to this Motion

as Exhibit A.

Plaintiff respectfully requests this Court enter an Order allowing her to file her amended complaint.

/s/ *W. Whitney Seals*  
W. WHITNEY SEALS,  
Attorney for Plaintiff

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## CERTIFICATE OF SERVICE

I hereby certify on May 4, 2023, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following;

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*Counsel for IC System Inc.*

and I hereby certified that I have mailed the foregoing document by U.S. Mail, postage prepaid, to the following non-CM/ECF participants:

NONE.

/s/W. Whitney Seals

OF COUNSEL